

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195 (SHS) (OTW)

Daily News, LP; Chicago Tribune Company,
LLC; Orlando Sentinel Communications
Company, LLC; Sun-Sentinel Company,
LLC; San Jose Mercury News, LLC; DP
Media Network, LLC; ORB Publishing,
LLC; and Northwest Publications, LLC

Plaintiffs,

v.

MICROSOFT CORPORATION, et al.,

Defendants.

Civil Action No. 1:24-cv-3285 (SHS) (OTW)

**PLAINTIFFS THE NEW YORK TIMES COMPANY AND DAILY NEWS, LP ET AL.'S
MOTION TO SEAL**

Under paragraph 22 of the Stipulated Protective Order in this case (Dkt. 127), Plaintiffs The New York Times Company (“The Times”) and Daily News, LP et al. (“Daily News”) (collectively, the “News Plaintiffs”) respectfully seek to provisionally file under seal a portion of their letter motion to compel. The letter motion seeks a conference to discuss a discovery dispute—specifically, the News Plaintiffs’ request for OpenAI to provide discovery into additional products. The News Plaintiffs seek to file portions of this letter motion under seal because an exhibit to the motion discusses documents that OpenAI designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22. The News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* The News Plaintiffs will review OpenAI’s filing, and if necessary, confer about any disagreement.

Dated: October 24, 2024

/s/ Ian Crosby

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